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August 13, 2014

**VIA ECF**

The Honorable Chief Judge Carol Bagley Amon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: Lowenbien v. Vengroff Williams, Inc.**  
**14 CV 3288 (CBA)**

Dear Judge Amon:

I represent the plaintiff in the above referenced matter. Yesterday, plaintiff filed his letter response to defendant's application for a pre-motion conference. However, since plaintiff in the said response requested additional relief, meaning the cancellation of the conference, plaintiff believes that it is appropriate that a separate motion be filed. The filing of the amended complaint cures any issue raised and deems the matter and renders defendant's proposed motion moot.

In the interest of a useful expenditure of the parties' time, we ask that the court cancel the pre motion conference. See *Pinkesz v. Portfolio Recovery Associates, LLC*, No. 1:12-cv-02508 Doc 19 (E.D.N.Y. Nov 14, 2012) ("Since defendant's pre-motion conference request related to the original complaint, this Court agrees with plaintiff that the November 1, 2012, request has been mooted by the filing of the amended complaint. Defendant has 14 days from service of the amended pleading in which to answer or file a pre-motion conference request relating to the amended complaint.) *Goldstein v. Frederick J. Hanna & Associates, P.C.* No. No. 1:13-cv-00776 (E.D.N.Y Apr 14, 2013) (same).

Plaintiff therefore requests that the pre-motion conference be adjourned.

Yours faithfully,

/s/

Adam J. Fishbein

Cc: Concepcion A. Montoya, Esq.